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ended. *Bailey v. Loeb*, 2 Fed. Cas. 376; *In re Webb*, 29 Fed. Cas. 494; *In re Breck*, 4 Fed. Cas. 43; *In re Jefferson*, 93 Fed. 948; *Re Hays F. & W. Co.*, 117 Fed. 879. Those holding in accord with the principal case say that unless the trustee in bankruptcy elects to take the lease, the tenant continues in the lease as though there had been no bankruptcy. *Re Roth & Appel*, 181 Fed. 667; *Cobb v. Overman*, 109 Fed. 65; *Re Hinckel Brewing Co.*, 123 Fed. 942; *Re Ells*, 98 Fed. 968.

BIGAMY.—CAN AN INVALID MARRIAGE BE AVOIDED WITHOUT LEGAL PROCESS?—Defendant while under the statutory age of consent and between fourteen and fifteen years of age, contracted a marriage which was followed by cohabitation for a short time. Defendant then renounced the marriage and left his wife, and five years later married another woman. In a prosecution for bigamy defendant was held guilty. *Garner v. State*, (Ala. 1913) 64 So. 183.

This decision is in accord with the weight of authority. However, in *People v. Slack*, 15 Mich. 192 and in *People v. Schoonmaker*, 119 Mich. 242, 77 N. W. 934, under a statute declaring that if either of the parties was under the age of consent at the time the marriage was solemnized and if they separated during such nonage and did not cohabit afterwards the marriage shall be deemed void without any decree of divorce or other legal process, it was held that the decree of marriage could be renounced by the party under the age of consent. In *Shaffer v. The State*, 20 Ohio 1 the defendant married under the age of consent. He left his wife and married again and it was held that as the first marriage had not been confirmed by cohabitation after the defendant arrived at the age of consent, a conviction for bigamy could not be sustained. In *Canale v. People*, 177 Ill. 219, 52 N. E. 310 the general rule was recognized that a marriage, invalid where celebrated, is invalid everywhere and a marriage void by the laws of Italy because the parties were under age, and which was disaffirmed by the parties before the age of consent, was held insufficient to support a conviction of bigamy based on a subsequent marriage of one of the parties in this country. At the common law the only case in which the marriage is absolutely void from want of age to consent is where either party to it is below the age of seven. 1 BLACKSTONE COM. 436. The common law age of consent is twelve for females and fourteen for males, but marriages by parties under this age were, subject to the above restriction, voidable and could be disaffirmed without judicial decree by the party under age on becoming of age. 1 BLACKSTONE COM. 436. The general rule is that marriages under the statutory age of consent are voidable and unless avoided the marriage is valid. *Koonce v. Wallace*, 52 N. C. 194. And in *Smith v. Smith*, 84 Ga. 440, although the code declared marriages by parties under the age of consent void, yet cohabitation after reaching the age of consent was held to ratify and confirm the marriage. For extensive note on this subject see 22 L. R. A. N. S. 1202.

COMMERCE.—STATE REGULATION OF PEDDLERS AND DRUMMERS.—The defendant travelled through Michigan soliciting orders for a foreign firm. The goods were shipped to defendant in carload lots, the packages being mixed